



John R. Kasich, Governor  
Mary Taylor, Lt. Governor  
Scott J. Nally, Director

September 20, 2013

Mr. Christopher Beeman  
Ohio River Partners, LLC  
551 Lake Cascade Parkway  
Findlay, Ohio 45840

**Re: Final Closure Letter – ARCO Scrubber Ductwork Laydown Area  
RISK ASSESSMENT  
Former RG Steel Property  
OHD 010 448 231**

Dear Mr. Beeman:

On September 13, 2011, Ohio EPA approved the amended closure plan for the Former RG Steel, LLC's ARCO Scrubber Ductwork Laydown area located at 1001 Main Street, Martins Ferry, Ohio 43935.

On September 12, 2013, the director received final closure certification documents from your consultant Civil & Environmental Consultants, Inc. for the portion of the former RG Steel property which Ohio River Partners, LLC has purchased. Both, Mary B. Novac, Project Scientist and Andrew G. McCorkle, CPG were signatories to this certification. James E. Zentmeyer, PE and you certified that the former RG Steel ARCO Scrubber Ductwork Laydown area has been closed according to the specifications in the approved amended closure plan. The type of closure was a restricted closure by demonstration of successful decontamination to below health-based standards through a risk assessment.

To verify the closure activities for the ARCO Scrubber Ductwork Laydown, Melody Stewart from Ohio EPA's Southeast District Office conducted a final inspection of the former RG Steel, LLC property on September 18, 2013. She also reviewed documents pertaining to the closure of the ARCO Scrubber Ductwork Laydown area and determined that the activities proposed in the closure plan were conducted adequately.

Based on this inspection and review, Ohio EPA has determined that ARCO Scrubber Ductwork Laydown area has been closed according to the approved closure plan and the substantive requirements of Ohio Administrative Code (OAC) rules 3745-55-11 through 3745-55-15.



The facility's compliance with closure obligations under Ohio's hazardous waste laws does not discharge Ohio River Partners, LLC's obligation to investigate and possibly clean up contamination from releases of hazardous waste or hazardous constituents at the facility, regardless of when the waste was placed in the unit. This requirement is known as RCRA Corrective Action.

Because the ARCO Scrubber Ductwork Laydown area has been closed, Ohio River Partners, LLC is no longer subject to the financial assurance requirements for closure or liability coverage.

If you have any questions concerning the closure process or the status of the facility, please contact Melody Stewart by phone at 740.380.5256.

Sincerely,



R. Edwin Gortner, Manager  
DERR-SEDO

REG/MS/mr

cc: Ed Lim, Engineering, DERR, CO  
Connie Livchak, Supervisor FARU, DMWM  
RCRAInfo Data Entry  
Mary B. Novak, Civil & Environmental Consultants, Inc.